

Representation

Draft Modification Report

0429: Customer Settlement Error Claims Process

Consultation close out date: 07 June 2013

Respond to: enquiries@gasgovernance.co.uk

Organisation: EDF Energy

Representative: Jonathan Kiddle

Date of Representation: 07 June 2013

Do you support or oppose implementation?

Oppose implementation

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

We support the accurate targeting of costs and believe that Shippers, in whatever segment of the market they operate in, should attract the correct charges due to them over their period of supply. However, EDF Energy does not think that this modification meets the relevant objective (d) because there are not enough controls or suitable criteria in place to accurately validate these significant adjustments and that Shippers should not have to wait several years in order for invoices to be fully finalised. We feel any disputes process needs to be a lot more transparent for all market participants in order to work properly. We are also concerned that this modification will reduce the incentive for Shippers to identify and resolve errors in a timely manner. EDF Energy believes that Shippers should be working together to reduce the reconciliation window and cost targeting of gas consumption which will reduce the magnitude of prior year adjustments and level of risk Shippers have to absorb.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

No

Relevant Objectives:

We do not believe it has a positive impact on the relevant objective (d). This proposal exposes Shippers to a longer period of financial uncertainty and therefore does not contribute to securing effective competition. Shippers should be encouraged to identify and resolve material inaccuracies in a timely manner.

Impacts and Costs:

Minimal – Training and development

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Version 1.0

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Implementation:

EDF Energy does not support the implementation of this modification.

Legal Text:

No Comments

Is there anything further you wish to be taken into account?

No Comments